

Message

From: Adams, Glenn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C79E328CD4484265B012DFA81663F5E7-ADAMS, GLENN]
Sent: 10/20/2021 10:44:38 PM
To: Hockey, David [Hockey.David@epa.gov]; Torres, Ramon [Torres.Ramon@epa.gov]
CC: Gervais, Gregory [Gervais.Gregory@epa.gov]; Chaffins, Randall [Chaffins.Randall@epa.gov]; Amoroso, Cathy [Amoroso.Cathy@epa.gov]
Subject: RE: Next week meetings
Attachments: EPA Approach to EMDF Risk-based Instream Water Quality Values for Radionuclides 10 20 2021.docx; Fish Meals and PRG Summary Approach 19OCT21.docx

Cathy and I will adjust our calendar to meet whenever ya can meet.

I'm attaching a rewrite of the proposal I sent out last Friday based on a few comments we received. Hopefully the revision is a little bit clearer to the process. Also, to my knowledge, we are really needing to discuss 2 issues. Both of these issues are addressed in the EPA approach for the risk based values. I have also attached the white paper that provides the science justification behind the fish meals/consumption rate used in the calculations. Both of these can be shared with whoever would need to see them before any meetings. If there is another issue that we need to address, please let me know.

Thanks,
Glenn

Issues:

- 1) Use of site specific exposure assumptions in calculating the risk-based instream water quality values (aka PRGs) that will be used to calculate the effluent discharge levels. The comments we still receive are that there can not be any deviation from the CWA guidance for these values (e.g., fish consumption rate and years of exposure). We think the Administrator's Decision is clear that site specific assumptions can be used as long as they are scientifically justified.
- 2) The Administrator's Decision states that the ROD should contain the effluent discharge levels. To calculate the effluent discharge levels, specific information is needed in addition to the risk-based instream water quality values like where the pipe will discharge and the assimilative capacity at that location, the rate of discharge, etc. All of this information/data will not be available until the remedial design is completed. Therefore, the request to postpone the calculations of the effluent discharge levels until a later primary document like the Remedial Design or the Remedial Action Work Plan is being requested. The risk-based instream water quality values and the chemical AWQC values would be included in the ROD and the NPDES guidance to calculate the effluent discharge levels.

From: Hockey, David <Hockey.David@epa.gov>
Sent: Wednesday, October 20, 2021 5:17 PM
To: Torres, Ramon <Torres.Ramon@epa.gov>
Cc: Gervais, Gregory <Gervais.Gregory@epa.gov>; Chaffins, Randall <Chaffins.Randall@epa.gov>; Adams, Glenn <Adams.Glenn@epa.gov>
Subject: Re: Next week meetings

Any chance we can meet tomorrow? It will be very awkward to un-invite people for Monday.

Dave

On Oct 20, 2021, at 5:05 PM, Torres, Ramon <Torres.Ramon@epa.gov> wrote:

<image001.jpg>

Thanks David,

After spoke with my Acting RA this afternoon, he recommends that the Region and OLEM should meet first to discuss the response to Dimple and Larry S. questions/comments before we engage OGC, OECA in the conversation. We need to be at the same page with respect to the responses. I did not receive any response or reaction to FFRO (Greg) response to Dimple's questions. In addition, we need to articulate our position with respect to the location of the pipe (Larry S. comments). Once we discussed this matter among us, we will be in better position to brief OGC and OECA on our responses. Then we (Region, OLEM, OGC and OECA) brief the Principals (response to Carlton's request). Saying that, we need to re-structure our meeting for Monday and invite only Regional and OLEM representatives. Then schedule a meeting with OGC and OECA and later the briefing with the Principals. Sorry for all the back and forward. If we cannot do the meeting on Monday, we can do it Tuesday, but the sooner the better since we need to meet with OGC and OECA before briefing Carton et.al. I am available tomorrow but out on Friday. We can talk more about it tomorrow if you want.

Thanks,

Ramon Torres,

Acting Director
Superfund & Emergency Management Division
EPA Region 4
61 Forsyth SW
11th Floor
Atlanta, GA 30303
404-562-8454

From: Hockey, David <Hockey.David@epa.gov>

Sent: Wednesday, October 20, 2021 4:36 PM

To: Torres, Ramon <Torres.Ramon@epa.gov>

Subject: RE: Is Greg in the office this week?

Greg is back in the office tomorrow after 12:00pm. He's off this Friday and back in all next week.

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David Hockey
Acting Associate Director
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From: Torres, Ramon <Torres.Ramon@epa.gov>
Sent: Wednesday, October 20, 2021 4:35 PM
To: Hockey, David <Hockey.David@epa.gov>
Subject: Is Greg in the office this week?

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